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*Attorney for Plaintiff*  
 SINCO TECHNOLOGIES PTE LTD

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,  
 LTD.; XINGKE ELECTRONICS  
 (DONGGUAN) CO., LTD.; XINGKE  
 ELECTRONICS TECHNOLOGY CO., LTD.;  
 SINCOO ELECTRONICS TECHNOLOGY  
 CO., LTD.; MUI LIANG TJOA (an  
 individual); NG CHER YONG aka CY NG (an  
 individual); and LIEW YEW SOON aka  
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

**PLAINTIFF SINCO TECHNOLOGIES  
 PTE LTD'S *SECOND AMENDED*  
 TRIAL DEPOSITION DESIGNATIONS  
 [TO SERVE AS A REPLACEMENT OF  
 ECF DOC NO. 477-6, APPENDIX D.1]**

PRETRIAL HEARING

Date: October 5, 2021

Time: 3:00 p.m.

Place: Courtroom 5 – 17<sup>th</sup> Floor

Hon. Edward M. Chen

TRIAL DATE

November 1, 2021

Plaintiff SinCo Technologies Pte. Ltd, hereby provides notice of intent to play the following portions of the shortened videotaped deposition or read the following portions of the deposition transcripts identified herein, at the **November 1, 2021** Jury Trial. Plaintiff shall or may call witnesses live at trial as disclosed and referenced at [ECF 84] and those witnesses set forth in SinCo Technologies Pte Ltd.'s Initial Disclosures of **April 10, 2019**, unless so designated herein. Plaintiff reserves the right to supplement these disclosures to the extent any witness so referenced is not available for trial and has herein been deposed in this matter. Plaintiff SinCo Technologies Pte. Ltd, has relied on the **August 24, 2021**, meet and confer wherein it was

represented that all named Defendants would be appearing in person for trial.

## JOINT LIST OF DEPOSITION DESIGNATIONS, COUNTER-DESIGNATIONS AND OBJECTIONS

These designations anticipate the removal of objections and interaction not in the form of a question by counsel as presented to the Jury.

### I. HUI-HSIEN (ALISON) CHEN

#### DEPOSITION OF HUI-HSIEN (ALISON) CHEN TAKEN ON OCTOBER 5, 2021

PLAINTIFF'S DEPOSITION DESIGNATION (PAGE AND LINE NOS.)	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
6:22-7:12			
11:21-24		10:15-11:19	
12:10-20			
13:16-21			
14:3-18			
14:24-15:3			
15:19-22			
17:6			
17:12-16		17:23-24	
18:2-19:9	<b>Foundation / Relevance / Character / FRE 403.</b> 18:18-19:4. Questions regarding supply chain risks and whether a supplier is following laws in a jurisdiction or whether customers want suppliers to "respect intellectual property rights."		Witness is being presented as an Employee of Google, just as Andy Lim. This relates to Google's Supplier code of conduct and enforcement of said principles. Trial Ex. 408.
20:4-22:18			

## DEPOSITION OF HUI-HSIEN (ALISON) CHEN TAKEN ON OCTOBER 5, 2021

PLAINTIFF'S DEPOSITION DESIGNATION (PAGE AND LINE NOS.)	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
23:10-25:25	<b>Foundation / Relevance / Character / FRE 403.</b> Questions regarding whether a supplier was not meeting environmental code of conduct and general ethics should be excluded. (23:10- 24:14). No objection to remainder of designation.		Witness is being presented as an Employee of Google, just as Andy Lim. This relates to Google's Supplier code of conduct and enforcement of said principles. Trial Ex. 408.
26:4-22			
27:7-28:15			
28:21-29:5			
29:18-21			
30:1-10			
30:14-31:13			
31:16-39:13	<b>Counsel Testifying / Foundation.</b> 35:23- 36:25. The statements, "Well, the copy of the NDA we have is dated 2018" and "Google was already disclosing proprietary information" are facts not in evidence.		Witness is being presented as an Employee of Google, just as Andy Lim. This relates to Google's Supplier code of conduct and enforcement of said principles. Trial Ex. 408.
41:9-14	<b>Lacks Foundation / No Personal Knowledge / 403.</b> 41:9-42:12. Improper to question Google witness with no knowledge about Mark Liew's VISA	41:5-8	Witness is being presented as an Employee of Google, just as Andy Lim. Relevant that had she known Google would have red flagged conduct.

## DEPOSITION OF HUI-HSIEN (ALISON) CHEN TAKEN ON OCTOBER 5, 2021

PLAINTIFF'S DEPOSITION DESIGNATION (PAGE AND LINE NOS.)	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
	or his employer. Counsel making arguments through witness.		
41:22-42:21			
44:2-24			
45:15-46:3	<b>Hearsay.</b> Questions about statement by Alan Wong of Google about NDA are hearsay.		She contradicts use of "SINCO" later in her deposition. Trial Exhibits 409/410.
46:19-47:9	<b>Hearsay.</b> Questions about statement by Alan Wong of Google about NDA are hearsay.		Witness is being presented as an Employee of Google, just as Andy Lim. She knows Alan Wong as a peer.
47:13-48:4	<b>Hearsay.</b> Questions about statement by Alan Wong of Google about NDA are hearsay.		Witness is being presented as an Employee of Google, just as Andy Lim.
49:14-24			
50:2-11	<b>Hearsay.</b> Questions about witness's hearsay declaration.		Witness is being presented as an Employee of Google, just as Andy Lim. Credibility, scope of her knowledge.
50:17-23	<b>Hearsay.</b> Questions about witness's hearsay declaration.		Witness is being presented as an Employee of Google, just as Andy Lim. Credibility, scope of her knowledge.
51:5-52:3	<b>Hearsay.</b> Questions about witness's hearsay declaration.		Witness is being presented as an Employee of Google, just as Andy Lim. Credibility, scope of her knowledge.

## DEPOSITION OF HUI-HSIEN (ALISON) CHEN TAKEN ON OCTOBER 5, 2021

PLAINTIFF'S DEPOSITION DESIGNATION (PAGE AND LINE NOS.)	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
52:9-20			
57:2-9	<b>Lack of Personal Knowledge / Foundation.</b> Witness testifies on page 57:25 that "I have not seen this." Thus, the testimony is irrelevant and she cannot lay foundation for the exhibit.		Witness testifies as to the nature of these type of documents ( <i>i.e.</i> Purchase Orders)
58:6-11	<b>Lack of Personal Knowledge / Foundation.</b> Witness testifies on page 57:25 that "I have not seen this." Thus, the testimony is irrelevant and she cannot lay foundation for the exhibit.		Witness testifies as to the nature of these type of documents ( <i>i.e.</i> Purchase Orders)
58:20-60:22	<b>Lack of Personal Knowledge / Foundation.</b> Witness testifies on page 57:25 that "I have not seen this." Thus, the testimony is irrelevant and she cannot lay foundation for the exhibit.  Similarly, (60:15-22) should be excluded as non-responsive and lack of personal knowledge.		Witness testifies as to the nature of these type of documents ( <i>i.e.</i> Purchase Orders)
61:9-63:12	<b>Hearsay.</b> Questions about witness's hearsay declaration.		Not hearsay, as her declaration is an exhibit that she made. She acknowledges her declaration is

DEPOSITION OF HUI-HSIEN (ALISON) CHEN TAKEN ON OCTOBER 5, 2021

PLAINTIFF'S DEPOSITION DESIGNATION (PAGE AND LINE NOS.)	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
			incomplete. Business practices discussed.
64:5-69:12			
69:15-71:1	<b>Relevance / Character / FRE 403.</b> 69:20 - 71:17. Counsel improperly suggesting that Xingke did not "respect intellectual property rights" or violated "applicable laws."		Business practices discussed.
72:25-73:5	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		Business practices discussed. Lack of disclaimer by Defendants. No reference to Preliminary Injunction. Relevant to show Defendants' not avoiding confusion.

**II. Quek Seow Eng (Singapore)**DEPOSITION OF QUEK SEOW ENG, TAKEN ON MAY 28, 2019

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
9:8-9:21			
18:24-19:8			
19:16-22			
21:6-16			
21:20-22			

DEPOSITION OF QUEK SEOW ENG, TAKEN ON **MAY 28, 2019**

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
25:8-21			
28:24-29:14		29:18-23	
36:19-37:11		36:19-39:3	
39:4-15			
41:10-24			
42:3-20		42:21-43:8	
43:9-11			
44:17-45:4			
45:15-45:23			
47:9-49:11			
50:10-17			
51:7-13			
52:14-19			
53:2-5			
54:1-7		53:12-55:8	
54:22-55:3		56:21-57:2	
59:3-8		57:19-60:21	
59:20-24			
62:6-63:17			
65:23-66:3		66:4-13	
66:15 – 68:7		68:8-69:20	
69:21-25			
70:19 -71:4		71:17-21	

DEPOSITION OF QUEK SEOW ENG, TAKEN ON **MAY 28, 2019**

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
73:19-74:12			
76:7-14		76:15-78:20	
78:21-79:23			
85:20-23			
87:23-88:3			
91:2-8	<b>Lack of Foundation / 403.</b> Counsel mischaracterizes the document.		Witness recognizes Cy Ng's signature, which was the question. The document is not the subject asked about, it is the signature.
100:4-17			
133:9-134:6	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		Relevant to show Defendants not avoiding confusion. Amend to exclude reference to the Preliminary Injunction. 133:9 - 18
149:2-6	<b>Lack of foundation / assumes facts not in evidence / Non-responsive / 403.</b> The question does not ask "if" or "whether" Mr. Tjoa indicated he was the new management for SinCo; rather, counsel asks, "do you remember Mr. Tjoa indicating that he was new management for SinCo," thereby suggesting to the jury that this is factually true.		The answer does not indicate he did not make such a representation.



DEPOSITION OF QUEK SEOW ENG, TAKEN ON MAY 28, 2019  
(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
152:3-20		150:18-152:2	

**III. JERRY YANG DARUI (Singapore Permanent Resident)**

DEPOSITION OF JERRY YANG DARUI, TAKEN ON MAY 29, 2019  
(Page and Line Numbers) *Subject to Deposition of October 28 2021*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:6-9			
14:22-15:11		14:4-15:24	
18:14-22			
22:9-23:9		22:9-23:20	
30:4-15		24:15-25:7	
45:5-18			
51:9-16		51:4-16	
57:16-58:9			
60:13-64:1		60:13-68:2	
65:7-68:2		60:13-68:2	
73:13-75:9		72:7-75:9	
78:19-79:14	<b>Lack of Personal Knowledge / Foundation.</b> Witness answers "No" at 78:25 when asked if he has seen these documents before. Thus, the testimony is		Testimony is not based on the contents of the document. Questions are directed to witness knowledge.

DEPOSITION OF JERRY YANG DARUI, TAKEN ON **MAY 29, 2019**(Page and Line Numbers) ***Subject to Deposition of October 28 2021***

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
	irrelevant and he cannot lay foundation for the exhibit.		
82:11-12		82:11-18	
84:7-23			
85:20-86:8		85:20-86:14	
87:2-22		87:2-25	
88:19-89:3			
93:1-9			
96:17-25		96:17-97:13	
98:13-23			
101:9-23			
109:1-110:10			
111:11-22	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		This goes to willfulness as Defendants failed to use the disclaimer. Testimony does not reference Preliminary Injunction.
116:20-117:2	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		This goes to willfulness as Defendants failed to use the disclaimer. Testimony does not reference Preliminary Injunction. Admits no disclaimer.
118:16-22	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer"		This goes to willfulness as Defendants failed to

DEPOSITION OF JERRY YANG DARUI, TAKEN ON MAY 29, 2019(Page and Line Numbers) **Subject to Deposition of October 28 2021**

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
	required under preliminary injunction is excluded.		use the disclaimer. Testimony does not reference Preliminary Injunction. Witness confirmed disclaimer had to be deleted by sender.
119:11-14	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		This goes to willfulness as Defendants failed to use the disclaimer. Testimony does not reference Preliminary Injunction.
121:3-16	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		This goes to willfulness as Defendants failed to use the disclaimer. Testimony does not reference Preliminary Injunction.
123:20-124:11	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded.		Defendants advertised doing anodizing and making metal parts for U.S. customers, either they did it or the tenant did. Evidence showing they used SinCoo trademark, which is distinct from the SINCOO company.
124:15-125:16	<b>Defs' MIL No. 3 / 401 / 403.</b> Ex. 116 is SinCoo's website. Evidence regarding "SinCoo" is excluded.		Evidence of Defendants using the SinCoo trademark.

**IV. GOUKI GAO (People's Republic of China)**

DEPOSITION OF GOUKI GAO, TAKEN ON **MAY 30, 2019**(Page and Line Numbers) ***Subject to Deposition of October 28 2021***

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:5-24			
13:2-12		13:2-23	
13:17-23		13:2-23	
14:21-17:7	<b>Lack of foundation / assumes facts not in evidence / FRE 403.</b> 15:21-17:3 Counsel's question assumes facts not in evidence re: statements by Google and other evidence		Admission against interest, and testimony relating to use and practice of trademark in U.S.
17:21-18:24			
20:1-23:25	<b>Lack of foundation / assumes facts not in evidence / FRE 403.</b> 20:1-21:3. Counsel's question assumes facts not in evidence re: "ML Tjoa lied" and committed "perjury" and is unfairly prejudicial. Contains misleading hypothetical.		Admission against interest, and testimony relating to use and practice of trademark in U.S. Testimony demonstrates inconsistent legal theory of the trademark XINGKE. Amended to 20:1-14 and 20:25-21:13
25:1-21			
27:2-4			
<del>27:8</del> 29:10	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded.		Withdrawn.
30:7-24			
33:1-8			
34:13-22			

35:20-36:25			
37:9-38:6	<b>Lack of foundation / assumes facts not in evidence.</b> 37:18-20 assumes facts not in evidence re: Pang's employment.		Admission against interest, and testimony relating to travel in U.S with Defendant Liew.
39:11-40:4		39:5-40:6	
42:4-44:22			
46:4-48:15			
55:20-56:15	<b>FRE 403.</b> Counsel's question about "false statement" to Bose is argumentative and misleading.	55:16-57:2 (if Objection overruled)	Admission against interest, and testimony relating to Bose visit to factory.
57:3-20		58:21-59:2	
59:3-62:24			
64:12-66:3		64:7-11	
66:9-67:5			
67:21-74:4			
77:15-22		77:23-78:9	
79:8-80:8		79:5-79:7	
102:11-24	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded. (See p. 111 -112 connecting "CNC" machines to SinCoo)		Defendants advertised doing Anodizing and making metal parts for U.S. customers, either they did it or the tenant did. Evidence showing they used SinCoo trademark, which is distinct from the SINCOO company.
104:22-105:17		104:14-104:21	
106:2-6			

109:10-110:4	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		Does not reference the Preliminary Injunction. Simply using a disclaimer is not inadmissible.
111:10-112:22	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded.		Defendants advertised doing Anodizing and making metal parts for U.S. customers, either they did it or the tenant did. Evidence showing they used SinCoo trademark, which is distinct from the SINCOO company.
<del>113:8-114:12</del>	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded.		Withdrawn
117:22-125:15	<b>Defs' MIL No. 3 / 401 / 403.</b> 119:1-119:22. Evidence regarding "SinCoo" is excluded.		Defendants advertised doing Anodizing and making metal parts for U.S. customers, either they did it or the tenant did. Evidence showing they used SinCoo trademark, which is distinct from the SINCOO company. Not being use to attribute SINCOO company liability to Defendants, as that has been withdrawn.
130:19-22			

## V. ERIC PANG (Singapore)

DEPOSITION OF ERIC PANG, TAKEN ON MAY 31, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:11-14			
9:1-3			
15:15-16:20			
18:12-17		23:1-24:15 25:7-25:11 28:1-29:6 29:13-30:12 32:25-33:6 33:14-34:25	
42:3- 43:24		43:3-48:5	
44:6-17			
46:22-47:7			
47:4-48:23			
49:5-8		49:9-16	
51:2-53:4			
56:15-18	<b>Foundation / 403.</b> No context provided in reference to "he references here."		This is his understanding, again inconsistent with Defendants' theory of the case.
59:8-17			
60:21-25			
63:24-64:4	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		There is no reference to preliminary injunction. Relevant to show Defendants' not avoiding confusion.
67:3-68:7			

DEPOSITION OF ERIC PANG, TAKEN ON MAY 31, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
75:25-76:11			
77:6-79:9		77:5	
79:15-17			
80:2-3			
80:6-20			
81:12-24			
82:15-18			
85:22-24		85:12-21	
86:23-87:25			
88:24-89:10			
95:5-97:12	<p><b>401/403:</b> Testimony regarding KOTL's financial status or ability to support Apple's business around April 25, 2018 is irrelevant to whether it infringed upon plaintiff's trademark; alternatively, its probative value is substantially outweighed by its unfair prejudice.</p> <p><b>Hearsay:</b> The out of court statement by a customer suggesting that KOTL is "cash or resource strapped or foresee a problem with the business" is hearsay.</p>		Withdrawn.



DEPOSITION OF ERIC PANG, TAKEN ON MAY 31, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
101:17-102:7	<b>Defs' MIL No. 4 / 401 / 403.</b> Testimony re: "disclaimer" required under preliminary injunction is excluded.		There is no reference to preliminary injunction. Relevant to show Defendants' not avoiding confusion.
105:1-17			
105:18-106:14	<b>Lacks foundation / 403.</b> 105:18-1-6:14. Marketing report and annual meeting referenced is for Jinlong, not XingKe - - misleading to jury.		
107:19-108:10			
109:13-110:10			
110:22-111:21		111:22-112:1	
<del>114:21-115:18</del>	<b>Lacks foundation / 403.</b> Witness is testifying about his personal sales; lacks foundation to make clear to jury he is not testifying about corporate sales. Misleading to the jury.		Withdrawn
120:11-24	<b>Lack of Foundation / 401 / 403.</b> Counsel asks whether witness knows if a third party company with "Xingke" in name infringes a XingKe trademark. Irrelevant and confusing.		Relevant as to Trademark knowledge.

DEPOSITION OF ERIC PANG, TAKEN ON MAY 31, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
121:2-17			
123:5-11			
123:19-25			
124:14-125:16	<b>Lack of foundation / personal knowledge.</b> Witness testified he started in 2017 (p.123) and was not at meeting with Bose referenced in testimony and exhibit.	124:10-13	Witness is working on Bose Projects. Amended 125:3-16

**VI. BRYAN LIM (Singapore)**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:10-9:13		9:23-10:17	
10:18-11:7			
15:8-15:11		15:8-25 17:6-18:3 18:6-19:3	
22:7-9		25:16-26:1 29:1-4 29:7 29:9-12 29:16-16 30:12-17 30:21-21 30:23-24 31:2-9 31:11 31:13-22	
32:5-17		32:1-3 32:5-12	

DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
33:8-11		32:5-35:12	
34:18-21		32:5-35:12	
35:3-25		32:5-35:12 35:15-36:21	
36:1-37:9		35:15-36:21 36:23-38:15	
37:10-38:12		36:23-38:15 38:23-39:11	
39:3-39:16		38:23-39:11 39:13-24 40:1-14	
41:7-42:1		41:7-42:8 42:12-15 42:18-23 43:2-19 43:21-22 43:24-44:2 44:4-4 44:7-8 44:10-45:19 49:12-51:6	
51:20-53:14			
53:11-53:22			
53:23-54:11			
55:18-55:21	<b>Lack of foundation. FRE 403.</b>		This was Defendants' deposition.
60:25-61:10			
64:24-67:19	<b>Lack of foundation (with shortened designations from Defs). FRE 403.</b>		This was Defendants' deposition.
68:9-18		68:1-20 68:23-25 69:2-20 70:2-71:25 84:10-85:12	

DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
85:18-86:4		85:18-86:4	
88:24-90:12		92:13-93:4 93:23-99:4 99:6 99:8-100:17	
103:1-8		101:5-10 112:2-11 112:24-113:12 113:15-16 113:18-114:1 123:13-124:11 127:9-128:2 128:4-5 128:7-133:20 133:22-134:5	
103:14-104:2	<b>Def's MIL No. 4 (401/403) -</b> Testimony relevant to trade secret claims	101:5-10 112:2-11 112:24-113:12 113:15-16 113:18-114:1 123:13-124:11 127:9-128:2 128:4-5 128:7-133:20 133:22-134:5	This goes to the fact that Plaintiff is not just a "sales agent" as Defendants' try to portray.
106:18-23	<b>Def's MIL No. 4 (401/403) -</b> Testimony relevant to trade secret claims	101:5-10 112:2-11 112:24-113:12 113:15-16 113:18-114:1 123:13-124:11 127:9-128:2 128:4-5 128:7-133:20 133:22-134:5	This goes to the fact that Plaintiff is not just a "sales agent" as Defendants' try to portray.
140:6-12		140:6-12 153:19-22 154:9-155:1 158:5-162:1	
160:9-20		158:5-162:1 165:16-17 165:20-166:24	
165:24-168:13		165:20-166:24 167:2-23	

DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
		168:20-169:17 179:2-21	
180:6-12		180:13-181:18	

**VII. DEQIANG LIU (People's Republic of China)**DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019(Page and Line Numbers) *Subject to Deposition of October 28 2021*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:22-9:11	<b>Lacks Foundation / Unfair Prejudice.</b> No context for designated testimony or clear purpose other than insinuation that witness wrote email when testimony says he did not (9:15-16).	9:12-9:19 (if Objection overruled)	Withdrawn
17:19-21			
19:1-23:24	<b>Relevance / Prejudicial / FRE 408 / FRE 106.</b> 23:10-20 reference settlement conferences.		Withdrawn
21:15-22:14			
22:15-23:20	<b>Prejudicial / FRE 408 / FRE 106.</b> 23:10-20 reference settlement conferences.		Relevant to describe Tjoa involvement in the company.
24:19-26:3			
38:2-15	<b>Lacks Foundation / 403 / Assumes facts contract to evidence.</b> Witness does not work for Jinlong (see p. 46:10-15); line of questioning is about Jinlong and witness lacks personal knowledge.		Witness was the GM for Defendant XINGKE. His understanding is relevant.

DEPOSITION OF DEQIANG LIU, TAKEN ON **NOVEMBER 1, 2019**(Page and Line Numbers) ***Subject to Deposition of October 28 2021***

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
38:16-39:12	<b>Lacks Foundation / 403 / Assumes facts contract to evidence.</b> Witness does not work for Jinlong (see p. 46:10-15); line of questioning is about Jinlong and witness lacks personal knowledge.		Witness was the GM for Defendant XINGKE. His understanding is relevant.
43:15-44:6			
47:2-5			
48:15-50:6	<b>Non-responsive / Irrelevant / Prejudicial / Assumes facts not in evidence.</b> 50:5-6 is a question by counsel that the witness did not answer.		Witness was the GM for Defendant XINGKE. His understanding is relevant.
51:11-52:25		50:23-52:25	
54:18-64:20	<p><b>Non-responsive / Irrelevant / Prejudicial / Vague / Calls for Legal Conclusion.</b> Entire section is generally counsel arguing with witness about pronunciation with extended colloquy and self-serving argument by counsel. (See, e.g., counsel stating: "I'm totally confused" (55:13) and "That's just my point. The confusion is that they sound so similar, right." (54:15-16)); ("Just because there's so much confusion" (58:16-19)).</p> <p><b>Def's MIL No. 3.</b> Testimony re: "SinCoo" is excluded. (Referenced at page 62).</p> <p><b>Lack of Personal Knowledge / Foundation.</b> Witness testifies at 59:9, 59:24, 60:13-14 and 60:21 that he is not familiar with trademark registrations and is asked about them repeatedly.</p>		Amended 57:22-58:20 and 64:7-12

## DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019

(Page and Line Numbers) **Subject to Deposition of October 28 2021**

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	<b>Calls for a legal conclusion / Relevance / Unfair Prejudice.</b> Whether "SinCo" and "XingKe" sound similar in the witness's "individual capacity" and "not as an expert" goes beyond the testimony of a lay witness.  <b>Assumes facts not in evidence / Foundation.</b> The witness lacks personal knowledge as to how much Jinlong Equipment and Machinery acquired Dongguan. 64:17-20.		
63:7-64:12	<b>Calls for a legal conclusion / Relevance / Unfair Prejudice.</b> See Objections for 54:18-64-20.		
66:2-67:14	<b>Defs' MIL No. 4 / 401 / 403.</b> 66:6-14. Testimony re preliminary injunction is excluded.	66:2-67:5	Amended: 66:2-14
67:1-5			
<del>75:11-15</del>	<b>Lacks Foundation / 403.</b> No context for designated testimony or clear purpose other than insinuation that witness doesn't remember an email.		Withdrawn
81:1-83:4	<b>Lacks Foundation.</b> Picks up line of questioning mid-way through without context (no explanation for "he and his team"). Entire line of questioning is vague and confusing ("Is this something that happens all the time"?)  <b>Mischaracterizes evidence/ 403.</b> Counsel repeatedly arguing about "embedded" employee; witness does not testify to that. References testimony from "five minutes ago" that did not happen.		Amended:81:16-83:4

## DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019

(Page and Line Numbers) **Subject to Deposition of October 28 2021**

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
87:5-88:18	<b>Lack of foundation / Assumes facts not in evidence / Non-responsive.</b> Picks up line of questioning mid-way through without context (no explanation of "KC"). Counsel is mischaracterizing emails (this email "basically says").		Amended: 88:10-15
91:4-22	<b>Lack of foundation / Assumes facts not in evidence / Non-responsive.</b> See objection immediately above.		Withdrawn
95:14-96:5		95:14-96:7	
109:1-114:25		115:1-18	
119:1-125:24	<b>Lack of Personal Knowledge / Foundation / 403.</b> Witness answers "no" (121:15) when asked if he has seen Exhibit 295 (120:22) before; as a result remainder of testimony about time periods is confusing.		Withdrawn
125:22-129:25	<b>Defs' MIL No. 3 / 401 / 403.</b> Evidence regarding "SinCoo" is excluded.		Evidence that Defendant XINGKE was operating under SinCoo trademark. Amended 125:22-126:17
130:6-146:25	<b>Def's MIL No. 4.</b> 130:22-132:21 (questions relevant to trade secret claim).		The fact that GM doesn't know the biggest customer of the factory is relevant to show someone else was managing the factory.
151:1-155:15	<b>Assumes facts not in evidence / Prejudice.</b> Counsel's question assumes facts not in evidence re	150:13-150:25	Amended 153:15-155:11, relevant to show someone else



DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019(Page and Line Numbers) ***Subject to Deposition of October 28 2021***

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	appointment to GM position ("ML just came up to you and told you you are now general manage. But there was no formal interview?"; "not based on merit or anything like that?").		was managing the factory.
<del>156:20-157:25</del>	<b>FRE 401.</b> 157:25 Question without answer.		Withdrawn
<del>160:15-162:1</del>	<b>Relevance / Prejudicial / Non-responsive / Hearsay.</b> 161:9-162:1 does not contain any answers by the sworn witness; rather it is attorney argument and colloquy about "stupid questions" and the like.	160:7-14	Withdrawn

Dated: October 26, 2021

Respectfully submitted,

ROPERS MAJESKI PC

By: /s/ Lael Andara

LAEL D. ANDARA

***Attorney for Plaintiff***

SINCO TECHNOLOGIES PTE LTD